

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11803-MLW

SHENIA DANCY-STEWART as
Administratrix of the Estate
of EVELINE BARROS-CEPEDA,
MARIA DaROSA, and LUIS
CARVALHO,

Plaintiffs,

v.

THOMAS TAYLOR, Jr., and the
CITY OF BOSTON,
Defendants.

DEFENDANT THOMAS TAYLOR'S SECOND ASSENTED-TO MOTION
TO ENLARGE TIME TO FILE RESPONSIVE PLEADINGS
PURSUANT TO FED.R.CIV.P. 6(B).

NOW COMES the Defendant, Thomas Taylor, who respectfully moves this Honorable Court pursuant to Fed. R. Civ. P. 6(b) for an extension of time to file a responsive pleading. As grounds for his motion, the Defendant states that:

1. The Plaintiff has assented to the Defendants request for more time to file responsive pleadings (Rule 7.1 certification included below);
2. Undersigned counsel requires additional time to investigate the Complaint and draft responsive pleadings;
3. The Defendant requests an extension until January 22, 2006, to file a response to Plaintiffs' Complaint; and,
4. Allowing this motion will not prejudice any party to the action and permitting the Defendant an extension to file

responsive pleadings to Plaintiffs' Complaint will further the interests of justice.

WHEREFORE, the Defendant, Thomas Taylor respectfully requests that this Honorable Court allow his motion to extend time to file responsive pleadings, and set the date for filing of responsive pleadings on or before January 22, 2006.

Respectfully submitted,

DEFENDANT, THOMAS TAYLOR JR.

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of this document was served upon counsel of record for the Plaintiffs via U.S. Mail to Law Office of Andrew Stockwell-Alpert, 11 Beacon Street, Suite 1210, Boston, MA 02108.

12/19/05 /s/ Helen Litsas
Date

Merita A. Hopkins
Corporation Counsel

By his attorneys:

/s/ Helen Litsas
Helen Litsas BBO# 644848
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7.1 Certification

Undersigned counsel certifies that on December 13, 2005, pursuant to LR, D. Mass. 7.1(a)(2), she spoke with Plaintiffs' counsel, Andrew Stockwell Esq., who assented to the Defendant's request for more time to file responsive pleadings.

Date: 12/19/05

Helen Litsas
Helen Litsas, Esq.

